



United States Department of Justice

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January 31, 2025

By ECF

Hon. Mae A. D'Agostino
U.S. District Judge
Northern District of New York
James T. Foley U.S. Courthouse
445 Broadway
Albany, New York 12207

RE: United States v. Kris Roglieri, No. 1:24-CR-392 (MAD)

Dear Judge D'Agostino:

Pursuant to Federal Rule of Criminal Procedure 16(d)(1), we write to respectfully request a protective order limiting the dissemination of an FBI report (the "Report") concerning the defendant's December 22, 2023 interview by members of the FBI's New York City Field Office, which is conducting a separate investigation into a third party with the U.S. Attorney's Office for the Southern District of New York, as discussed at page 20 of the government's opposition to the defendant's now-denied challenge to his pretrial detention (Dkt. # 67). While the Report was made available to defense counsel for inspection on January 10, 2025 under Rule 16(a)(1)(B), defense counsel has asked that it be made available for the defendant's review.

The U.S. Attorney's Office for the Southern District of New York and defense counsel are in agreement to disclosure of the Report pursuant to a court order containing the following terms: (i) defense counsel does not disseminate the Report beyond members of the Federal Public Defender's Office for the Northern District of New York; (ii) the defendant may review the Report with defense counsel but he may not retain a copy of it; and (iii) all references to the contents of the Report must be redacted from future public filings. As such, we respectfully request that the Court issue a protective order containing the above-referenced terms by so ordering this letter request.

We thank the Court for its attention to this matter.

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Respectfully submitted,

CARLA B. FREEDMAN
United States Attorney

By:



Joshua R. Rosenthal
Michael Barnett
Assistant United States Attorneys
Bar Roll Nos. 700730 & 519140

cc: Counsel of record (by ECF)

The government's request as set forth above is so ORDERED.

Dated: _____

Hon. Mae A. D'Agostino
United States District Judge